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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Tyler Baker, Individually and on behalf
of all others similarly situated,

Plaintiff,

v.

Ignite International, LTD.,

Defendant.

Case No. 2:20-cv-01172-JCM-DJA

**STIPULATION OF DISMISSAL OF
ACTION WITHOUT PREJUDICE AS TO
THE NAMED PLAINTIFF AND
WITHOUT PREJUDICE AS TO THE
PUTATIVE CLASS**

Plaintiff Tyler Baker and Defendant Ignite International, LTD. (“the Parties”) hereby moves to dismiss the above entitled action without prejudice as to the named Plaintiff and without prejudice as to the Putative Class, pursuant to Fed. R. Civ. Procedure 41(a)(1)(ii), each party shall bear his/its own costs. The notice and approval requirements of Federal Rule of Civil Procedure 23(e) are inapplicable to the parties’ settlement and dismissal of this Putative Class action because this action has not been certified as a class.

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WHEREFORE, the Parties respectfully requests that this court dismiss this action without prejudice as to the named Plaintiff, and without prejudice as to the Putative Class.

KAZEROUNI LAW GROUP, APC

Date: September 1, 2020

By: s/ Gustavo Ponce

Gustavo Ponce, Esq.
6069 S. Fort Apache Rd., Ste. 100
Las Vegas, NV 89148
Attorneys for Plaintiff

FLANGAS LAW GROUP

Date: September 1, 2020

By: s/ Kimberly P. Stein

Kimberly P. Stein, Esq.
3275 S. Jones Blvd., Ste. 105
Las Vegas, NV 89146
Attorneys for Defendant

IT IS SO ORDERED.


UNITED STATES DISTRICT JUDGE

Dated: September 4, 2020

CERTIFICATE OF SERVICE

I HEREBY CERTIFY pursuant to Rule 5 of the Federal Rules of Civil Procedure that on September 1, 2020, the foregoing Stipulation was served via CM/ECF to all parties appearing in this case.

Kazerouni Law Group, APC

By: /s/ Gustavo Ponce
Gustavo Ponce, Esq.
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